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APR 18 2001

FCC MAIL ROOM

Ms. Magalie Roman Salas, Secretary
Office of the Federal Communications Commission
445 12th Street, S.W., Room TW-B2-4
Washington, DC 20554

RE: CC Docket No. 01-88 – In the Matter of Application of SBC Communications, Inc.
Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region,
InterLATA Services in Missouri

Dear Ms. Salas:

Enclosed for filing in the above-captioned case are an original and four (4) conformed copies of the **WRITTEN CONSULTATION OF THE MISSOURI PUBLIC SERVICE COMMISSION** and a computer diskette containing the filing.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

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Assistant General Counsel
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Enclosure
cc: Counsel of Record

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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APR 18 2001

FCC MAIL ROOM

In the Matter of)

Application of SBC Communications, Inc.)

Pursuant to Section 271 of the)

Telecommunications Act of 1996 To Provide)

In-Region, InterLATA Services in Missouri)

CC Docket No. 01-88

**WRITTEN CONSULTATION OF THE
MISSOURI PUBLIC SERVICE COMMISSION**

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ATTACHMENT 1:

**ORDER REGARDING RECOMMENDATION ON 271 APPLICATION
PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996 AND
APPROVING THE MISSOURI INTERCONNECTION AGREEMENT (M2A)**

ATTACHMENT 2:

ORDER APPROVING STIPULATION AND AGREEMENT (APRIL 12, 2001)

ATTACHMENT 3:

ORDER ESTABLISHING PROCEDURAL SCHEDULES (APRIL 10, 2001)

WRITTEN CONSULTATION

On April 4, 2001, SBC Communications Inc. with its subsidiaries Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance jointly filed with the Federal Communications Commission their application for authorization under Section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA Services in Missouri. In response the FCC established CC Docket No. 01-88 and issued a notice setting dates for the filing of comments by third parties and written consultations by the Department of Justice and the Missouri Public Service Commission.

Because the Missouri Public Service Commission's March 15, 2001 *Order Regarding Recommendation on 271 Application Pursuant to the Telecommunications Act of 1996 and Approving The Missouri Interconnection Agreement (M2A)* details the Missouri Commission's evaluation, a certified copy of that order is submitted herewith as an attachment (Attachment 1) and serves as the major part of the Missouri Commission's Written Consultation. (A copy of that order also appears at tab 98 of Appendix C of the application filed with the FCC on April 4, 2001, in CC Docket No. 01-88.)

In its March 15, 2001 order, at page 91, the Missouri Public Service Commission expressed its "intention to expeditiously determine permanent rates, terms, and conditions for collocation, line sharing, line splitting, loop conditioning, and unbundled network elements." These are interim in the M2A. The cases in which these permanent rates, terms and conditions will be set are: *In the Matter of Southwestern Bell Telephone*

Company's Proposed Tariff PSC Mo. No. 42 Local Access Service Tariff Regarding Physical and Virtual Collocation, Case No. TT-2001-298; In the Matter of the Determination of Prices, Terms, and Conditions of Certain Unbundled Network Elements, Case No. TO-2001-438; In the Matter of the Determination of Prices, Terms, and Conditions of Conditioning for xDSL-capable Loops, Case No. TO-2001-439; and In the Matter of the Determination of Prices, Terms, and Conditions of Line-Splitting and Line-Sharing, Case No. TO-2001-440.

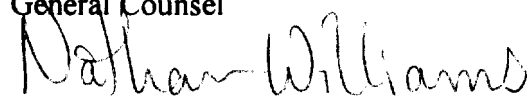
On April 12, 2001, this Commission issued its order establishing a revised procedural schedule in Case No. TT-2001-298. A certified copy of this order is attached (Attachment 2). Under this schedule the issues will be submitted to this Commission for decision this summer. On April 10, 2001, this Commission issued its order establishing procedural schedules in Case Nos. TO-2001-438, 439 and 440. A certified copy of this order is attached (Attachment 3). The issues in Case No. TO-2001-438 are to be heard on December 3-7, 2001; those in Case No. TO-2001-439 are to be heard on August 7-9, 2001; and those in Case No. TO-2001-440 are to be heard in two phases, the first on August 20-22, 2001, and the second on December 3-7, 2001. This Commission is carrying through on its expressed intention to expeditiously determine permanent rates, terms and conditions for collocation, line sharing, line splitting, loop conditioning, and unbundled network elements.

The Missouri Public Service Commission continues to support the joint application of SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long

Distance to the FCC for authorization under Section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA Services in Missouri.

Respectfully Submitted,

DANA K JOYCE
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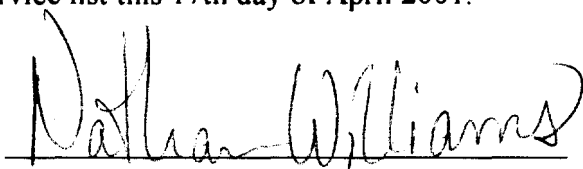


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 17th day of April 2001.



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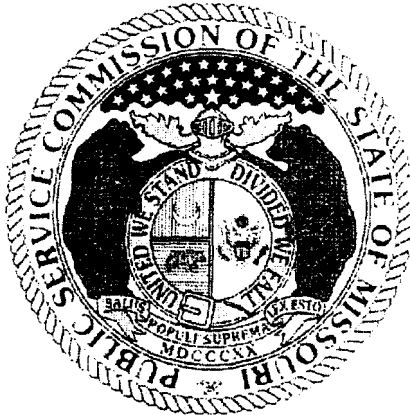
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**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**



In the Matter of the Application of Southwestern)
Bell Telephone Company to Provide Notice of Intent)
to File an Application for Authorization to)
Provide In-region InterLATA Services Originating)
in Missouri Pursuant to Section 271 of the Telecom-)
munications Act of 1996.)

Case No. TO-99-227

**ORDER REGARDING RECOMMENDATION ON
271 APPLICATION PURSUANT TO THE TELECOMMUNICATIONS
ACT OF 1996 AND APPROVING THE MISSOURI
INTERCONNECTION AGREEMENT (M2A)**

Issue Date:

March 15, 2001

Effective Date:

March 25, 2001

ATTACHMENT 1

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996.) Case No. TO-99-227

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REGULATORY LAW JUDGE: Nancy Dippell, Senior.

**ORDER REGARDING RECOMMENDATION ON 271 APPLICATION
PURSUANT TO TELECOMMUNICATIONS ACT OF 1996
AND APPROVING THE MISSOURI
INTERCONNECTION AGREEMENT (M2A)**

On November 20, 1998, Southwestern Bell Telephone Company (SWBT) notified the Missouri Public Service Commission (Commission) of its intent to file with the Federal Communications Commission (FCC) its application for authority to provide interLATA telecommunications services in Missouri under section 271 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (the Act). Section 271(d)(2)(B) of the Act provides that the FCC shall consult with the appropriate state commission before ruling on the application of any Bell operating company (BOC) to provide in-region, interLATA service. See, 47 U.S.C. § 271(d)(2)(B). In preparation for fulfilling its role under the federal statute, the Commission has held proceedings and received

testimony and other evidence to determine if SWBT has complied with the requirements of the Act.

After extensive hearings and comments, the Commission finds that SWBT has satisfied the requirements of 47 U.S.C. § 271(c) for authority to provide interLATA services in Missouri and that SWBT's entry into the interLATA long-distance market in Missouri is in the public interest. Based on the extensive record in this case and the Commission's intention to expeditiously determine permanent rates for collocation, line sharing/line splitting, loop conditioning, and unbundled network elements, the Commission supports SWBT's application.

PROCEDURAL HISTORY

SWBT initiated this proceeding with its filing on November 20, 1998. Following full evidentiary hearings held between March 1 and March 10, 1999, the Commission issued an order directing the Missouri PSC Staff (Staff) to hire outside consultants to evaluate and verify the data underlying SWBT's performance measurements. After the conclusion of a request for proposal process, the Staff recommended that Ernst & Young perform a validation of SWBT's performance measures and verify that Telcordia's test of SWBT's five-state operations support systems (OSS) was sufficient to address anticipated commercial volumes of competitive local exchange carrier (CLEC) orders doing business in Missouri. SWBT's Hughes Aff. ¶ 14.

SWBT filed a Motion to Update the Record and for Approval of the Missouri 271 Interconnection Agreement on June 28, 2000, supported by detailed affidavits. Taking advantage of the extensive record developed by the Texas Public Utilities Commission in a similar proceeding, SWBT filed its proposed Missouri section 271 Interconnection Agreement (M2A), which is modeled after the Texas 271 Interconnection Agreement (T2A). Id. ¶¶ 4, 7.

The T2A has been reviewed and approved by the Texas Public Utilities Commission and SWBT's application for interLATA authority in the state of Texas, including the prices, terms, and conditions of the T2A, has been approved by the FCC.

The M2A as originally filed generally follows the substantive terms of the T2A, but also incorporated this Commission's arbitration decisions as well as other modifications described in the affidavits accompanying SWBT's draft application. See, id. ¶ 7. The M2A provided terms for interconnection, access to unbundled network elements (UNEs) (including combined UNEs not currently combined in SWBT's network), and resale. Id. ¶¶ 7, 8. The M2A is effective for one year after this Commission's approval as meeting the 14-point competitive checklist;¹ upon FCC approval of SWBT's 271 Application in Missouri, the terms of the M2A may be extended for an additional three years. Id.; SWBT's Sparks Aff. ¶ 25.

Following responses by intervening parties, SWBT filed supporting reply affidavits on September 20, 2000. The Commission then conducted extensive on-the-record question and answer sessions on October 11-12, 2000, and then again on November 8-9, 2000. The Commission gave each CLEC that chose to participate every opportunity to raise any issue in response to SWBT's request for authority to provide interLATA long-distance services in Missouri. On November 20, 2000, SWBT filed an updated M2A that incorporated numerous revisions to which SWBT had agreed in the course of the proceedings in this case. The intervening parties filed responses to the question and answer sessions and to the updated M2A. At the direction of the Commission, the parties also filed summaries of their evidence and

¹ The Commission issued an order on March 6, 2001, finding that SWBT had complied with the 14-point checklist and indicating support for SWBT's application to the FCC.

position statements. On January 31, 2001, the Commission held a final on-the-record conference with the parties.

On January 30, 2001, the parties met with Ernst & Young in a technical conference to discuss their evaluation. Reports regarding that conference were filed on February 13, 2001. Also on February 13, 2001, the Commission issued an Interim Order in which it explained its current position and indicated areas in which it found that SWBT was not yet in compliance with section 271(2)(B) of the Act. Following that order, SWBT filed another revised M2A and the parties filed responses and requests for reconsideration.

Final revisions to the M2A were filed by SWBT on February 28, 2001. Staff filed a response on March 1, 2001, stating its opinion that, with the final revisions, SWBT's revised M2A was fully compliant with the Interim Order.

STATUTORY FRAMEWORK

In the Act, BOC provision of in-region, interLATA service is conditioned on compliance with the provisions of section 271. Pursuant to section 271, BOCs must apply to the FCC for authorization to provide interLATA services in each state within the BOCs region. With respect to each state within the region, the BOC must show

that: (1) it satisfies the requirements of either section 271(c)(1)(A), known as "Track A" or 271(c)(1)(B), known as "Track B"; (2) it has "fully implemented the competitive checklist" or that the statements approved by the state under section 252 satisfy the competitive checklist contained in section 271 (c)(2)(B); (3) the requested authorization will be carried out in accordance with the requirements of section 272; and (4) the BOC's entry into in-region, interLATA market is "consistent with the public interest, convenience, and necessity."²

² Memorandum Opinion and Order, In re: Joint Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, FCC Docket No. 00-217, (rel. Jan. 22, 2001), ¶ 8.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Missouri Public Service Commission, having considered all of the competent and substantial evidence upon the whole record, makes the following findings of fact and conclusions of law. The positions and arguments of all of the parties have been considered by the Commission in making this decision. Failure to specifically address a piece of evidence, position or argument of any party does not indicate that the Commission has failed to consider relevant evidence, but indicates rather that the omitted material was not dispositive of this decision.

I. PRELIMINARY ISSUES

A. FINDINGS OF FACT

SWBT submitted its first draft section 271 application in November 1998. Based upon the record developed through evidentiary hearings conducted by this Commission in March 1999 and the whole of a similar Section 271 proceeding in the state of Texas, the Commission Staff recommended that Ernst & Young perform a validation of SWBT's performance measures and verify that Telcordia's test of SWBT's five-state OSS is sufficient to address anticipated commercial volumes of Missouri-CLEC orders. SWBT's Hughes Aff. ¶ 14.

The operations, systems, and procedures employed by SWBT are managed on a region-wide basis. That region includes Missouri, Texas, Oklahoma, Kansas and Arkansas. The Public Utility Commission of Texas (Texas Commission) has performed a substantial review in collaboration with SWBT and CLECs.

SWBT made use of the Texas Commission's extensive review by filing with this Commission, on June 28, 2000, the Missouri 271 Agreement (M2A), which is modeled after the Texas 271 Agreement (T2A). Id. ¶¶ 4, 7. The

M2A generally follows the substantive terms of the T2A but incorporates arbitration decisions of this Commission, as well as other modifications. See id. ¶ 7. The M2A was subsequently revised and resubmitted on November 20, 2000, and February 16, 2001. Final revisions to the M2A were submitted on February 28, 2001.

The M2A provides binding terms for interconnection, access to unbundled network elements (UNEs) (including combined UNEs not currently combined in SWBT's network), and resale. Id. ¶¶ 7, 8. The M2A is effective for one year after this Commission's order finding compliance with section 271(c). After FCC approval of SWBT's 271 Application in Missouri, the terms of the M2A may be extended for an additional three years. Id.; SWBT's Sparks Aff. ¶ 25.

B. CONCLUSIONS OF LAW

The Commission has conducted these proceedings and reviewed SWBT's Application to provide in-region, interLATA telecommunications services in Missouri in order to fulfill its role under federal law to consult with the FCC pursuant to section 271(d)(2)(B). The Commission has carefully reviewed all of the evidence presented to it in this proceeding, including the testimony provided at the on-the-record question and answer sessions concluded in November 2000 and the on-the-record conference held on January 31, 2001. In addition, the Commission has considered the additional comments, testimony, and evidence provided up to the issuance of this order. The Commission has also taken notice of the FCC's review and findings in the Texas Order.³ Because the operations, systems, and procedures employed by SWBT are managed on a region-wide basis, the

³ Memorandum Opinion and Order, Application by SBC Communications Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas, CC Docket No. 00-65, FCC 00-238 (rel. June 30, 2000) ("Texas Order").

conclusions reached with respect to SWBT's 271 application in Texas are relevant to Missouri.

II. THE MISSOURI 271 AGREEMENT

A. FINDINGS OF FACT

To ensure that CLECs have easy access to a contract incorporating SWBT's various section 271 commitments, SWBT has proposed the M2A, a comprehensive contract relating to all aspects of SWBT's wholesale operations in Missouri.⁴ The T2A, on which the M2A is modeled, was created out of an extensive and thorough collaborative process. See generally SWBT's Shelley Aff. (Attachment A to SWBT's Hughes Aff.). The Texas Commission approved the T2A on October 13, 1999.⁵ Many of the same CLECs that were parties to the Texas negotiations are parties to this proceeding and are providing similar local telephone service in Missouri.

There are differences between the M2A and the T2A. See generally, SWBT's Joint Sparks, Hughes, Dysart, Rogers Aff. (SWBT's Joint Aff.) and Attachs. A (matrix presenting differences between T2A and M2A) and B (presenting pricing differences between T2A and revised M2A). See also, SWBT's responses filed February 16, 2001, and February 28, 2001. A major difference is that the prices of UNEs, interconnection, and resale in the M2A reflect Missouri specific rates where Missouri-specific cost studies have been undertaken, rather than the rates applicable in Texas. See, SWBT's Hughes Aff. Some of the prices in the M2A are interim and subject to true-up. See, Hughes Reply Aff. ¶ 3.

⁴ See M2A § 4.1.1.

⁵ Order No. 55 Approving the Texas 271 Agreement, Investigation of SWBT Telephone Company's Entry into the Texas InterLATA Telecommunications Market, Project No. 16251 (Tex. PUC Oct. 13, 1999).

Unlike the T2A, the optional amendments available with the M2A address specific FCC requirements that were not in place at the time of the Texas filing. For example, there are certain unbundling obligations in the UNE Remand Order⁶ that became effective on May 17, 2000, after the Texas application had been filed.⁷ Similarly, the FCC's recent Line Sharing Order,⁸ which became effective on June 6, 2000, requires that SWBT show that it has implemented the loop facility and OSS modifications necessary to accommodate the unbundling of the high-frequency portion of the loop. The optional amendments available with the M2A reflect SWBT's compliance with these new requirements. See, SWBT's Sparks Aff. ¶¶ 75-82.

The M2A offers CLECs access to dark fiber, sub-loop unbundling, local switching, tandem switching, signaling networks, call-related databases, line conditioning, and information on loop qualification. See, id. ¶¶ 79-82. The M2A further provides CLECs a means to obtain any additional UNES required by the FCC or identified through arbitration. See, id. ¶ 74; M2A Attach. 6 - UNE § 14.5.

SWBT has also made changes to the M2A to incorporate the latest performance measures and business rules as adopted in the state of Texas. See, SWBT's Joint Aff. ¶¶ 30-43; SWBT's Dysart Reply Aff. ¶¶ 11-18. These also include changes in performance measure provisions attributable to

⁶ Third Report and Order and Fourth Further Notice of Proposed Rulemaking, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 15 FCC Rcd 3696 (1999) ("UNE Remand Order").

⁷ See id. at 3926, ¶ 526. The requirements that were not contained in 47 C.F.R. § 51.319 prior to the rule being vacated by the Supreme Court in AT&T Corp. v. Iowa Utilities Board, 525 U.S. 366 (1999), became effective 120 days after publication in the Federal Register. The new unbundling requirements include SWBT's obligation to offer unbundled access to its dark fiber, sub-loops and inside wire, packet switching, dark fiber transport, calling name and 911 databases, and loop qualification information. 15 FCC Rcd at 3926, ¶ 527 n.1040.

⁸ See Third Report and Order in CC Docket No. 98-147, Fourth Report and Order in CC Docket No. 96-98, Deployment of Wireline Services Offering Advanced Telecommunications Capability, 14 FCC Rcd 20912 (1999) ("Line Sharing Order"); SWBT's Sparks Aff. ¶¶ 84-96.

different state entities and regulation in Missouri, as well as Missouri-specific damage adjustments and assessment level adjustments. See, id. ¶ 30.

The FCC approved Version 1.6 of the performance measurements in the Texas Order, and SWBT has gathered and reported data to this Commission under Version 1.6. But in July 2000, at the end of a six-month collaborative review of the performance measurements, including multiple workshops with AT&T, WorldCom, Sprint, other CLECs, and SWBT, the Texas Commission directed that the performance measurement plan be modified by eliminating 30 measures, adding 17 new ones, and modifying an additional 84.⁹ The revised set of performance measures is known as Version 1.7 of the business rules. Notably, Version 1.7 also serves as the basis for the performance remedy plans that the Oklahoma Corporation Commission (OCC) and the Kansas Corporation Commission (KCC) have approved.

SWBT also provides for some services in the M2A beyond what it is legally obligated to provide. For example, the M2A requires SWBT to combine certain UNEs that are not already combined in its network.¹⁰ SWBT has agreed, therefore, to provide CLECs new loop-to-switch platform combinations,¹¹ as well as new combinations of loop and transport facilities known as the Enhanced Extended Loop (EEL).¹²

⁹ Order No. 13, Section 271 Compliance Monitoring of SWBT Telephone Company of Texas, Project No. 20400 (Tex. PUC July __, 2000), and Order No. 15, Implementation of Docket Nos. 20226 and 20272, Project No. 22165 (Tex. PUC July 19, 2000).

¹⁰ See, SWBT's Sparks Aff. ¶ 88; see also, T2A Attach.- 6 - UNE §§ 14.2, 14.7. In the Texas Order, the FCC clarified that, for combinations that did not pre-exist, incumbent local exchange carriers ("ILECs") had an obligation to provide CLECs access to UNEs only in a manner that enables CLECs to combine those elements. See, Texas Order ¶¶ 216-218.

¹¹ See, SWBT's Sparks Aff. ¶ 89; M2A Attach. 6 - UNE §§ 14.2-14.4.

¹² See, Sparks Aff. ¶ 89; M2A Attach. 6 - UNE § 14.7.

SWBT has also agreed to a number of additional modifications to the M2A. For example, in response to Staff's concerns, SWBT has removed language providing that the performance measurements plan is the sole and exclusive remedy for failure to meet applicable standards and benchmarks. This change includes a minimum annual cap on liability which is equivalent to the Texas performance measurements plan. SWBT has also modified its proposed penalties for failure to file performance reports on time or filing incomplete reports. See, SWBT's Dysart Reply Aff. ¶ 29; SWBT's Oct. 26 Comments at 2-3.

SWBT has stated that it will interpret the M2A language relating to the use of SWBT's network in the provision of intraLATA toll by third parties and the party responsible for terminating compensation, in the same manner as comparable T2A language has been interpreted in the Sage arbitration. See, SWBT's Oct. 26 Comments at 42. SWBT has also agreed, through its negotiations with Birch, to make operational changes in the event DSL was previously provisioned on any multi-line hunt groups. This change and interpretation will apply equally to all CLECs. Id.

SWBT has also proposed specific amendments to the M2A based on questions raised by the Commission. Those revisions were included in the revised M2A filed on November 20, 2000. The revisions included posting the aggregate performance results for both Version 1.6 and Version 1.7 of the Business Rules, providing for changes to comply with intervening law, and permitting CLECs to seek an expedited dispute resolution with Staff serving the role of mediator. Changes were also made to clarify the nonrecurring charges for certain UNE combinations. SWBT's Post Oct. Hearing Comments at 4-5.

SWBT has made other changes in order to comply with the Commission's Interim Order issued on February 13, 2001. Those changes include:

A. General Terms and Conditions: The revised M2A eliminates Section 3 pertaining to deposits and revises Section 10.7 to eliminate the reference to Section 3 and insert the provision from the T2A concerning deposits after initiation of disconnect procedures. In addition, the revised M2A contains some "clean-up" provisions, including the listing in the Table of Contents of (1) the Appendix Pricing-UNE: Exhibit 1 and (2) Version 1.7 of the Performance Measurement Business Rules, as well as the renumbering of misnumbered paragraphs in Sections 2, 4, 7 and 8, and the correction of misspelled words in Sections 9, 18 and 54.

B. Appendix Pricing-UNE: Schedule of Prices: There are a number of changes to this Appendix including: (1) the reduction of certain nonrecurring charges (NRCs) by up to 25 percent, but not to a level below the corresponding NRCs in the Texas 271 Agreement (T2A); (2) listing of Texas rates on an interim, subject to true-up basis for the 95¹³ rates identified as not having been previously reviewed by the Commission;¹⁴ (3) revisions to reflect that the rates previously established in Case No. TO-98-115 should be interim, subject to true-up; and (4) "clean-up" revisions to the notes to reflect the proper sources of rates (e.g., SS7 transport per message, STP Port per port, and DS3 dedicated transport cross connects were revised to reflect that these rates are pursuant to the Commission's July 31, 1997, Order in Case No. TO-97-40).

¹³ See, February 13 Order, pp. 5-6.

¹⁴ SWBT included Springfield as Zone 1 for pricing purposes for transport mileage and termination for voice grade, OC3 and OC12 interoffice transport and OC3 and OC12 entrance facilities.

C. Attachment 13 - Appendix: Physical Collocation: This appendix was revised to state that it will be in effect only until the effective date of an order approving a physical collocation tariff in Case No. TT-2001-298 or other appropriate case established by the Commission. This appendix has also been revised to utilize Texas rates and rate elements¹⁵ on an interim, subject to true-up basis as set forth in Sections 20 and 21. In addition, certain clean-up revisions have been made (e.g., removal of citations to Texas central offices in Section 6.1.3(c), correction of a misspelled word in Section 6.6.6 and substitution of the word "tariff" for the word "appendix."

D. Attachment 13 - Appendix: Virtual Collocation: Changes similar to those in Attachment 13 - Appendix: Physical Collocation have also been made in this appendix. Section 13.0 provides the rates shall be interim, subject to true-up. References to Kansas were changed to Missouri in Sections 2.0, 5.2, 11.0, 15.2, 15.3 and 16.1. Section 17.0 provides that the rates are interim, subject to true-up. The rates in Section 17.3 reflect Texas rates.

E. Attachment 25: DSL: This attachment has been revised to reflect that conditioning rates from Texas are to be utilized on an interim, subject to true-up basis to the rates established in Case No. TO-2000-322, Case No. TO-2001-439 or other appropriate case established by the Commission as set forth in Section 11.4.

F. Line Sharing: Optional Line Sharing Amendment-Appendix to Attachment 25: xDSL: Pursuant to the February 13 Order, SWBT has attached a redlined version of the Texas line sharing amendment which has been modified for application in Missouri. Under the M2A, this optional

¹⁵ Use of Texas rate elements and rates complies with the requirements of the February 13, 2001, Order. SWBT has proposed alternative rate elements and rates in Case No. TT-2001-298.